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Attorneys for Defendant TikTok, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ELIZABETH WATERMAN,
Plaintiff,
v.
TIKTOK, INC.,
Defendant.

Case No. 2:24-CV-04802-AB-AJR

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT**

Complaint Served: June 14, 2024

Current Response Date: July 5, 2024

New Response Date: August 5, 2024

Plaintiff Elizabeth Waterman (“Plaintiff”) and Defendant TikTok, Inc. (“Defendant”) stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to the Complaint by (14) days pursuant to Local Rule 8-3.

WHEREAS, on June 7, 2024, Plaintiff filed a Complaint in this action against Defendant (ECF No. 1);

1 WHEREAS, according to the Proof of Service filed in this action (ECF
2 No. 11), Plaintiff served Defendant on June 14, 2024, making Defendant's answer or
3 response to the Complaint due on July 5, 2024;

4 WHEREAS, the parties previously agreed to extend the deadline for Defendant
5 to respond to the Complaint from July 5, 2024 to August 5, 2024 (ECF No. 14);

6 WHEREAS, the parties held a meet and confer pursuant to Local Rule 7-3 to
7 discuss issues underlying Defendant's motion to dismiss and have exchanged
8 information relating to those issues;

9 WHEREAS, having additional time to engage in further discussions will be
10 beneficial to the potential for resolving or narrowing issues in Defendants motion to
11 dismiss and/or to allow Plaintiff time to amend its Complaint to address those issues;

12 WHEREAS, Plaintiff and Defendant agree to a fourteen (14) day extension of
13 time to Defendant's deadline to answer or respond to the Complaint;

14 THEREFORE, Plaintiff and Defendant stipulate to a fourteen (14) day
15 extension of time, making Defendant's answer or response to the Complaint due on
16 August 19, 2024.

17 It is so stipulated.

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1 Dated: August 1, 2024

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3 By: /s/ J. Michael Keyes
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15 Dated: August 1, 2024

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23 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
24 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
content and have authorized this filing.

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
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